

**Paul S. Smith**

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**From:** Erika Floyd <erika@crmi.com>  
**Sent:** Tuesday, August 20, 2019 2:34 PM  
**To:** kevina@adamsresidential.com  
**Cc:** Scott Clement  
**Subject:** Re: Adams Residential Contracting Inc. adv. City of Seattle CRMI No. 47122

Hi Kevin:

DSI has retained Scott Clement of Clement & Drotz, PLLC to represent Adams Residential in this lawsuit. Mr. Clement's contact information is (206) 448-9595 or [sclement@clementdrotz.com](mailto:sclement@clementdrotz.com)

Please provide Mr. Clement with your full cooperation. Should you have any questions or concerns, please feel free to contact me.

Very Truly Yours,

Erika Floyd

Claims Resource Management, Inc.

(661) 265-6436

On 8/20/2019 2:18 PM, Erika Floyd wrote:

Hi Kevin:

The policy has certain exclusions and conditions which if they apply may have an effect on the coverage available under the policy. We are currently investigating if any of the exclusions and/or conditions may apply to this loss. We will be sending a letter shortly outlining in detail any potential coverage issues. DSI, the insurance carrier, has certain rights under the policy and my e-mail was simply advising that DSI is reserving all of its rights under the policy while our investigation is ongoing. In the same manner we understand that all of Adams Residential's also has rights under the policy and those rights are also reserved.

Should you have any questions or concerns, please feel free to contact me.

Very Truly Yours,

Erika Floyd  
Claims Resource Management, Inc.  
(661) 265-6436

On 8/20/2019 11:49 AM, Kevin Adams wrote:

Thanks Erika.

We will get the information together for you.

Could you explain the meaning of 'reservation of rights'?

I have added the office email so our office manager can track with us.

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**From:** Erika Floyd <[erika@crmi.com](mailto:erika@crmi.com)>  
**Sent:** Tuesday, August 20, 2019 11:44 AM  
**To:** Kevin Adams <[kevina@adamsresidential.com](mailto:kevina@adamsresidential.com)>  
**Subject:** Adams Residential Contracting Inc. adv. City of Seattle CRMI No. 47122

Hi Kevin:

Claims Resource Management, Inc. is the third party claims administrator for Developers Surety and Indemnity Company ("DSI") for the policy issued to Adams Residential Contracting, Inc. ("Adams Residential").

Thanks for speaking with me. As discussed, we are in the process of investigating coverage for this claim and need some additional information. Please provide us with a copy of the job documents you have for McDowell NW Pile King, Inc.'s ("McDowell") work on this project and a copy of the ticket/documents received from Washington One Call. The policy includes certain conditions which must be compiled with by Adams Residential when using subcontractors. Specifically Adams Residential must obtain a hold-harmless agreement from McDowell and be named as an additional insured under McDowell's insurance policy. Please provide us with any evidence Adams Residential has to show it complied with the policy conditions.

Lastly, I understand Adams Residential was served with the lawsuit on August 19th. We are in the process of retaining counsel to represent Adams Residential in this lawsuit and will provide you with defense counsel's contact information shortly. DSI is providing Adams Residential with a defense subject to a full and complete reservation of rights.

DSI's investigation of this matter is pursuant to a full and complete reservation of rights. Nothing in this e-mail should be considered a waiver of those rights which will continue in full force and effect. We understand Adams Residential's, and your, rights are similarly reserved.

Should you have any questions or concerns, please feel free to contact me.

Very Truly Yours,

Erika

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**Erika Floyd, Senior Claims Analyst**

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